

OFFICE MEMO

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FROM: Stein Buer *Sm B*
DWR Extended Review Team Coordinator

Trap Purpose Need Comments
DATE: January 24, 1996 *Rm 1155*

SUBJECT: Consolidated Comments,
Purpose and Need

This memo includes consolidated comments from members of DWR's Extended Review Team. The comments have been slightly edited, but were not reconciled to assure complete consistency among them. Overall, the comments indicate a need for higher specificity and clarity in the Purpose and Need texts and provide suggestions which can help guide revisions.

Comments were provided by Earle Cummings, Steve Ford, Kathy Kelly, Jim Spence, George Barnes, Curt Schmutte, Anna Hegedus, and Rick Woodard. My concerns were addressed by the various comments provided by this group.

Earle Cummings

Page 5: Purpose - The text reads, "The purpose of the CALFED Bay-Delta Program is to develop a long-term comprehensive plan that will restore ecological health and improve water management for beneficial uses of the Bay Delta system."

I think plans by themselves won't restore anything, so I suggest you insert some kind of call for action, like so:

"The purpose of the CALFED Bay-Delta Program is to develop a long-term comprehensive plan that WHEN FOLLOWED BY MAJOR STAKEHOLDERS will restore ecological health..."

Page 5: Purpose - The text reads: "The Bay-Delta Program is intended to achieve objectives in each of four areas: ecosystem quality, water supply reliability, water quality, and vulnerability of Bay-Delta system's functions." The first three of these values are all generally considered positive. More of them would be better. The fourth is usually viewed negatively... more vulnerability would be worse. Parallel structure is easier to grasp. Instead of using the word "vulnerability", I suggest a word like "resilience", or "robustness", or something else we want the system to have in greater degree.

Page 6: The Ecosystem Quality objective descriptions after the second and third bullet boxes are pretty hazy to me. I like sustainable, I like production, but box 2 could be cut down to "Improve and increase aquatic habitats so they can sustain forever production and survival of balanced indigenous populations of all forms of aquatic life." Box 3 could be amended similarly. If you don't like "forever", how about "indefinitely?"

Page 6: Water Supply Reliability - I think there are enough users that you should talk about "conflicts among them" instead of between them, which would be appropriate if there were only two. Has any thought been given to including a "demand management" term that would encourage industries and practices that are less vulnerable than existing systems to fluctuations in supply?

Page 8: para 3, Water Supply - Natural systems are adapted to, and in many cases dependent upon seasonal, annual, and in some cases extreme short-term fluctuations in the water supply. With respect to human developments, that same sort of fluctuation is considered to be intolerable, and much of our development for agricultural, industrial and domestic use relies on a dependable, rather than a fluctuating supply. The resolution of this conflict of needs can be to develop human systems and institutions that are better able to function effectively in spite of fluctuation in supply, rather than to attempt to suppress the fluctuations.

Steve Ford

Page 1, para. 3 In 5. - Suggest the third sentence be changed to, "There is no 'specific' [rather than 'similar'] requirement...". The NEPA and CEQA requirements seem very similar, at least to me.

Page 2, para.4. - You might add "...to meet that need." to the end of the paragraph, or in some other way more clearly indicate the linkage between need and purpose.

Page 4, para. 5. - You should also indicate whether all of the alternatives have to partly fulfill all of the project objectives - i.e. do you have to consider alternatives that may only meet some of the objectives?

Page 5, para. 4. In. 2 - A minor point, but you might want to substitute "plan to restore" or "plan that when implemented will restore" for "plan that will restore". In itself a plan will not restore anything. It can describe what actions are needed, but these actions have to be implemented before restoration will occur.

Page 6, para. 1- Don't think anything needs to be changed, but the first and second bullets seem to be sub-objectives of the third.

Page 8- You might consider ordering the topic headings and in the purpose section the same. It would make easier for a reader to match the four elements of need and purpose statements.

Page 8 para. 1- Is the need due to the high concentration of pollutants and presence of salts, or the fact that their concentrations are excessive and adversely effect

beneficial uses? If it is the latter you might want to add something like, "to levels that adversely effect beneficial uses." to the end of the second sentence, and change the third to, "The excessive concentration of both organic carbon and salts in the estuary are also of concern".

Page 8: para. 4, Vulnerability of Delta Functions- For clarity, I suggest you add "too" in front of "vulnerable" in the first sentence. In the last sentence change "impair" to "disrupt/impair".

Kathy Kelly

Overall, I think the approach being used is good. I do question the statement that the concentrations of many pollutants are elevated in the estuary's water, sediment, and living resources (I thought that would apply to the Bay and not the problem area defined by the Program) but I will leave any comment on it to the experts.

Page 6, under Water Supply Reliability, first bullet - Recommend the following change, "Reduce the conflict between beneficial water uses and ..."

Page 6, second bullet- I recommend the following change: "Reduce the uncertainty of Bay-Delta system water supplies to help meet short- and long-term municipal, agricultural, and industrial needs."

Page 6, under Vulnerability of Bay-Delta System Functions, first bullet- I am not sure what is meant by "conveyance facilities". Does it mean Delta channels, the X-Channel Gates, pumping plants? The term should be further defined.

Page 6, under Vulnerability of Bay-Delta System Functions, second bullet- It seems, "gradual deterioration of conveyance facilities", would be appropriate to include in this one.

Page 8, under Water Quality- Recreational uses should be included in this discussion.

Page 8, under Water Supply- This topic should only address municipal, industrial, and agricultural needs so I recommend the following change: "The water supply from the Delta does not adequately meet the needs of its users. The reliability of water supplies ..."

Page 8, under Vulnerability of Delta Functions- The following statement should be clarified: "Levee failure on certain islands would significantly impact water supply distribution functions." Supply functions as well as distribution functions could be significantly disrupted.

Jim Spence

Only comment from the Office of Coordinated Operations is on the first line of "PURPOSE" paragraph- The phrase, "to develop a long-term comprehensive plan" needs to be more specific about what constitutes long-term. Pages 1-2 discuss the need to be careful in wording the purpose and need statement so as to correctly drive the focus and range of the alternatives. The definition of long-term in this program directly drives the alternatives and should therefore be more definite and specific. I know this will be hard, but I think it is mandatory if CALFED wants to meet legal requirements.

George Barnes

There is no statement or goal to "increase average annual Delta exports to meet present and future water needs. A win-win should allow increased exports in times of surplus unstored flows while providing safeguards and enhancements to fish and aquatic habitats. Simply increasing reliability may only involve reducing export water demand.

Curt Schmutte

Page 6 under Vulnerability of Bay-Delta System Functions- I disagree with the way levee deterioration is characterized as being either gradual or catastrophic. Levees in the Delta are constantly being maintained to ensure flood protection. Likewise, natural forces such as land subsidence, soil consolidation, seepage, erosion, etc. constantly occur and, if left unchecked, will undermine levees. These natural processes inflict damage to levees in a gradual manner but by no means produce gradual results if not addressed in levee maintenance. When a levee fails, it is almost always a catastrophic event.

Also, to be consistent and more meaningful, replace statements that include "manage" with "reduce".

Page 8 under Vulnerability of Delta Functions- The list is incomplete and should include some of the following: "The Sacramento-San Joaquin Delta is irreplaceable, and without adequate levees the Delta as we know it today will be lost. The levees serve many diverse needs. They protect valuable wildlife habitat, farms, homes, urban areas, recreational developments, highways and railroads, natural gas fields, utility lines, major aqueducts, and other public developments. The levees are also critical to protecting Delta water quality and serve a significant function in the State's water transfer system."

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Page Five

Anna Hegedus

Page 6. First bullet on top of page- Remove the word "desirable". It sounds like a wish list of an individual, group, groups, State, feds, etc.--not descriptive enough. Suggested replacement "ecologically feasible".

Page 6. Third bullet- Be specific about the Delta species. We do not want and cannot increase population health and population size of all species. I have no suggestion for a new language, however, strongly recommend a revision.

Page 6. Last Bullet at bottom of page- This sentence can be interpreted two ways. To clarify meaning of sentence, insert "levees and thereby" between the words "Delta" and "conveyance".

Page 7. Third bullet from top of page- Same as previous comment.

Rick Woodard

Page 8, Water Quality paragraph, second line, third word. Replace "many" with "some". I do not believe it can be objectively demonstrated that "many" pollutants are elevated in the estuary.

cc: Mike Ford
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